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6 UNITED STATES DISTRICT COURT  
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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9 LENOVO (UNITED STATES) INC. and  
10 MOTOROLA MOBILITY, LLC,

11 *Plaintiffs,*

12 v.

13 IPCOM GMBH & CO., KG,  
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15 *Defendant.*  
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**Case No. 19-cv-01389-EJD-VKD**

**JOINT STATUS REPORT ON THE  
STATUS OF JURISDICTIONAL  
DISCOVERY**

Pursuant to the Court's Order of March 16, 2020 (Dkt. 88), plaintiffs Lenovo (United States) Inc. and Motorola Mobility, LLC ("Plaintiffs") and defendant IPCom GmbH & Co., KG ("IPCom" or "Defendant," and together with Plaintiffs, the "parties"), hereby submit the following brief, non-argumentative updated status report describing the status of jurisdictional discovery.

**1. The February 11, 2020 Discovery Hearing and Orders**

On February 14, 2020, the Court (Judge DeMarchi presiding) issued an Order providing guidelines regarding the permissible scope of discovery and required the parties to confer further regarding Plaintiffs' document requests. (Dkt. 80.) The Court stated that its Order was without prejudice to the parties submitting another joint discovery dispute letter after they complied with the Court's directions concerning meeting and conferring about the document requests.

**2. Subsequent Developments**

Plaintiffs sent IPCom revised document requests pursuant to the Court's February 14, 2020 order, and thereafter the parties exchanged written correspondence, held a telephone conference on March 24, 2020, and exchanged further correspondence thereafter.

*The parties have resolved some issues and continue to confer on others, as follows:* As noted in the parties' prior update, the parties have been conferring about the scope of the revised document categories Plaintiffs requested, and issues concerning IPCom's productions to date (consisting of three productions totaling 161 pages). Subsequently the parties conferred telephonically and in writing about these issues and were able to resolve some of them. The parties are continuing to confer regarding: (1) IPCom's production of a particular document; and (2) an issue concerning one category of documents.

*The parties have certain ripe disputes, as follows:* At present, the parties have six ripe disputes pertaining to eight categories of documents. The parties intend to file a joint discovery letter brief with the Court concerning these disputes, and possibly the additional two issues about which they continue to confer (identified above). For ease of review by the Court, the parties propose that their letter brief, for each dispute, state first Plaintiffs' position and then IPCom's position (rather than state Plaintiffs' positions on all disputes first, then IPCom's positions on all disputes second). In light of this proposed organization (which may necessitate some repetition),

1 and the number of ripe disputes to be addressed (i.e., six disputes relating to eight categories of  
 2 documents, and potentially the additional two issues identified above), Plaintiffs request that each  
 3 party be permitted to use 4,500 words total for their respective positions pursuant to the Court's  
 4 Standing Order for Civil Cases, section 4(c)(ii). Defendant requests that each party be permitted  
 5 to use 2,500 words total for their respective positions.

6 *Timing of submission of joint discovery dispute letter:* As the organization and word limit  
 7 will have a significant impact on how the letter is prepared, the parties intend to identify a date by  
 8 which the letter will be filed after receiving guidance from the Court on these aspects of the letter.

9 Respectfully submitted,

10 Dated: March 27, 2020

11 SHEPPARD, MULLIN, RICHTER &  
 12 HAMPTON LLP

MINTZ LEVIN COHN FERRIS GLOVSKY  
 AND POPEO P.C.

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**FILER'S ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I, Tenaya Rodewald, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of March, 2020, at Palo Alto, California.

/s/ Tenaya Rodewald  
Tenaya Rodewald